

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
ILANN M. MAAZEL
ERIC HECKER
MARIANN MEIER WANG
SARAH NETBURN
KATHERINE ROSENFELD
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
KENNISHA A. AUSTIN
DEBRA L. GREENBERGER
ELORA MUKHERJEE

EMERY CELLI BRINCKERHOFF & ABADY LLP

ATTORNEYS AT LAW
75 ROCKEFELLER PLAZA
NEW YORK, NEW YORK 10019

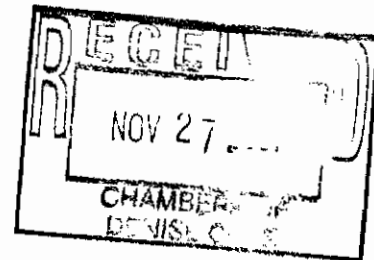
TELEPHONE
(212) 763-5000
TELECOPIER
(212) 763-5001
WEB ADDRESS
www.ecbalaw.com

MEMO ENDORSED

November 26, 2007

By Hand

Honorable Denise Cote
U.S. District Court Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1040
New York, New York 10007-1312

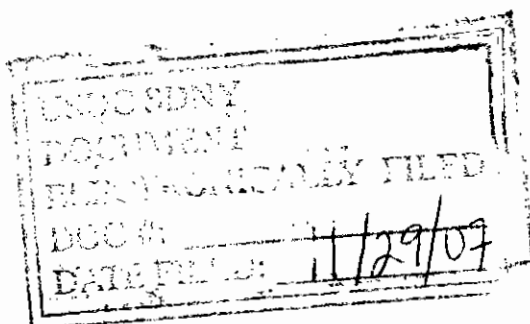


Re: Amendola v. Bristol-Myers Squibb Company, 07 Civ. 6088 (DLC)

Your Honor:

We represent plaintiff and the putative members of the collective action in the above-captioned case. We, along with defendant, jointly request that the schedule for plaintiff's motion for notice pursuant to FLSA § 216(b) be extended. Pursuant to the Court's September 13, 2007 scheduling order, plaintiff's motion is currently due on November 30, 2007, defendant's opposition is due on December 21, 2007, and plaintiff's reply is due on January 11, 2008. Due to difficulties in scheduling the 30(b)(6) depositions on § 216(b) certification, these dates are no longer feasible.


One 30(b)(6) deposition has already been held. That witness, however, was only able to testify regarding one of defendant's five divisions. Defendant has agreed to produce a representative from each of the remaining four divisions. Three of those witnesses are available and scheduled to be deposed on December 4, 11, and 14, 2007. The parties are in the process of confirming a date for the fourth witness, who has been on vacation, and we hope to schedule that deposition before December 14, 2007.



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The parties therefore jointly request that the Court extend the deadline for plaintiff's § 216(b) motion until December 21, 2007.¹ The parties further jointly request that defendant's opposition be due on January 21, 2008, and that plaintiff's reply be due on February 11, 2008. No prior requests for extensions have been made.

Respectfully Submitted,


Elizabeth S. Saylor

c: Bettina Plevan and Josh Alloy (by fax and e-mail)

Granted.

Jessie Coke
November 28, 2007

¹ If the parties are unable to schedule the fourth witness prior to December 14, 2007, the parties may seek an additional, brief, extension.